

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT H. KOONS, JR. and SALLY KOONS, his wife,	:	CIVIL ACTION
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	JURY TRIAL DEMANDED
PIEDMONT HAWTHORNE AVIATION, HAWTHORNE:	:	
A-B-E, INC., n/k/a HAWTHORNE AIRPORT	:	
SERVICES, INC., and PIEDMONT HAWTHORNE	:	No. 02CV2739
HOLDINGS, INC.,	:	
	:	
Defendants.	:	

**PLAINTIFFS' MOTION FOR RELIEF OF JUDGMENT PURSUANT TO FEDERAL  
RULE OF CIVIL PROCEDURE 60(B)**

For the reasons set forth in the accompanying Memorandum of Law, Plaintiffs respectfully request that the Court grant plaintiffs relief from judgment and order a new trial pursuant to Rule of Civil Procedure 60(B).

Respectfully submitted,

THE WOLK LAW FIRM

BY:

\_\_\_\_\_  
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HAWTHORNE A-B-E, INC., n/k/a HAWTHORNE	:	
AIRPORT SERVICES, INC., and PIEDMONT	:	No. 02CV2739
HAWTHORNE HOLDINGS, INC.,	:	
	:	
	:	
Defendants.	:	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on March 19, 2004, a true and correct copy of Plaintiffs' Motion for Relief of Judgment Pursuant to Federal Rule of Civil Procedure 60(b) was served upon counsel via facsimile and first class mail addressed as follows:

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